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ShawPittman LLP

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ROPINE OF THE SECRETARY

November 20, 2001

Via Courier

Ms. Magalie Roman Salas Office of the Secretary Federal Communications Commission 445 12th Street SW Washington, D.C. 20554

Re:

In the Matter of 2000 Biennial Review – Review of Policies and Rules Concerning Unauthorized Changes of Consumers Long Distance Carriers CC Docket No. 00-257

Dear Ms. Salas:

SouthWest TeleConnect, Inc. ("SouthWest TeleConnect"), by its undersigned attorneys and pursuant to 47 C.F.R. § 64.1120(e), respectfully notifies the Commission of the transfer of customers from Universal Telephone, Inc. ("Universal") to SouthWest TeleConnect.

Due to the expedited nature of the transaction described herein, it was not possible for SouthWest TeleConnect to comply precisely with the requirements set forth in the Commission's rule. It therefore respectfully requests that the Commission accept this late-filed notification and self-certification.1

Pursuant to section 64.1120(e), SouthWest TeleConnect notifies the Commission of the following:

The Commission has expressly delegated authority to the Common Carrier Bureau to address, on a case-by-case basis, situations in which it is impossible for a carrier to comply with the requirements of 47 C.F.R. § 64.1120(e). See, In the Matter of 2000 Biennial Review - Review of Policies and Rules Concerning Unauthorized Changes of Consumers Long Distance Carriers: Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996, Policies and Rules Concerning Unauthorized Changes of Consumers Long Distance Carriers, CC Docket Nos. 00-257, 94-129, First Report and Order in CC Docket No. 00-257 and Fourth Report and Order in CC Docket No. 94-129, FCC 01-156 (rel. May 15, 2001) at ¶ 20.

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<u>The Names of the Parties to the Transaction:</u> The parties to this transaction are Universal Telephone, Inc., the selling carrier, and SouthWest TeleConnect, the acquiring carrier.

<u>Description of the Transaction</u>: On September 19, 2001, SouthWest TeleConnect learned that Universal Telephone intended to terminate the provision of prepaid local service to approximately 4,000 residential customers in Kansas and Missouri, effective September 20, 2001. Within hours, SouthWest TeleConnect and Universal reached agreement whereby SouthWest TeleConnect acquired Universal's Kansas and Missouri customers and agreed to take over the operation of these accounts, thereby ensuring that these consumers' local service would not be disrupted.

To minimize customer confusion and make the transaction transparent to Universal customers, SouthWest TeleConnect decided to initially operate the Universal accounts under the same rates, terms, and conditions as provided by Universal, with one exception: it eliminated Universal's \$10.00 late payment fee.

SouthWest TeleConnect notified Universal's residential customers of the change of their basic local exchange service provider by letter dated September 25, 2001. This subscriber notice provided the information required by 47 C.F.R. § 64.1120(e)(3)(i)-(vii).

<u>The Types of Telecommunications Services to be Provided to the Affected</u>
<u>Subscribers</u>: The affected subscribers are residential local exchange customers located in Kansas and Missouri. SouthWest Teleconnect provides these consumers with prepaid local exchange service, including access to toll-free dialing, emergency services, and custom calling features. SouthWest TeleConnect does not offer intraLATA or interLATA services.

<u>The Date of the Transfer of the Subscriber Base to the Acquiring Carrier</u>: The date of the transfer of the subscriber base to SouthWest TeleConnect was September 20, 2001.

<u>Certification</u>: SouthWest's certification is appended hereto as Attachment A.

<u>Copy of Notice sent to affected subscribers</u>: Appended hereto as Attachment B is a copy of the September 25, 2001 notice that SouthWest TeleConnect mailed to the affected subscribers.

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Please date-stamp the enclosed extra copy of this filing and return it in the envelope provided. Please direct any questions to the undersigned.

Respectfully submitted,

man M. Clafoli

Glenn S. Richards

Susan M. Hafeli

Attachments

ATTACHMENT A

CERTIFICATION

I, Chad Hazam, being first duly sworn, state that I am the Vice President of SouthWest TeleConnect, Inc. ("SouthWest TeleConnect"), the party acquiring the customer base from Universal Telephone, as described in the attached letter; that I am authorized to make this certification on behalf of SouthWest TeleConnect; that I have read the foregoing letter and know its contents thereof; and that the same are true and correct to the best of my knowledge, information, and belief. I further state that although SouthWest TeleConnect was unable to precisely comply with the requirements of 47 C.F.R. § 64.1120(e), it provided subscriber notice of the change in carriers to affected customers; and that SouthWest TeleConnect will comply with the obligations specified in that notice and 47 C.F.R. § 64.1102(e)(3), as well as other applicable statutory and Commission requirements that apply to this customer base transfer.

Chad Hazam

Vice President

SouthWest TeleConnect Inc.

County of

Sworn and subscribed to before me this \? 2001.

day of November

Notary Public

My commission expires:

ATTACHMENT B

Dear Universal Telephone Customer,

WELCOME TO SOUTHWEST TELECONNECT.

Southwest Teleconnect is pleased to announce effective September 20, 2001, we are the provider of local telephone service to customers of the company formerly known as Universal Telephone. Until further notice we will be operating these accounts upon the same rates, terms, and conditions expressed under your current Universal Agreement. Please be advised that you may transfer your account to any local carrier of your choosing at any time.

Southwest Teleconnect will be responsible for any carrier change charges associated with this transfer of service from Universal. If you would like Freeze Protection after this transfer please contact Southwest Teleconnect and we will block your line from being switched to another carrier without your approval. Southwest Teleconnect will be responsible for resolving any complaints you may have concerning your service and will notify you of any change in rates, terms or conditions as required by all regulatory authorities. Southwest Teleconnect is a leader in the telecommunications industry; our service is of the highest quality.

Your home telephone service will not be interrupted or affected in any way due to this purchase. Also, as an additional bonus, Southwest Teleconnect will no longer be charging a \$10.00 late fee payable at the agent's office when you go to pay your bill. Remember, however, to pay your account on time to avoid suspension and disconnection of your service.

You recently received an invoice due September 28, 2001. If you have not yet paid this bill, please remit payment to:

Southwest Teleconnect P.O. Box 67070 Harrisburg, PA 17106-7070

If you have any questions please call our business office toll free at 1-800-695-6955. Our office hours are 8AM to 5PM, Monday through Friday.

We are pleased to have you as a customer, and look forward to providing you with quality local telephone service for many years to come.

Sincerely,

Southwest Teleconnect